BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of	)	
	)	
Review of the Pioneer's Preference Rules	)	ET Docket No. 93-266
	)	

To: The Federal Communications Commission

INITIAL COMMENTS OF SOUTHWESTERN BELL CORPORATION

Southwestern Bell Corporation ("SBC" or "Company"), files these comments on behalf of itself and its operating subsidiaries in response to the Federal Communications Commission's ("FCC") *Notice of Proposed Rulemaking* ("*NPRM*") issued and released in ET Docket No. 93-266 on October 21, 1993.

The Company supports the Commission's tentative decision to withdraw the pioneer's preference rules for those services whose use of radiofrequency spectrum will be subject to competitive bidding pursuant to the Budget Reconciliation Act of 1993, Pub. L. 103-66, codified at 47 U.S.C. § 309(j) ("Budget Act") and takes no position on whether the tentative awards for preferences in broadband personal communications services ("PCS") should be withdrawn. Further, as SBC explained in its *ex parte* letter of October 14, 1993, if the Commission does not withdraw the

preference rules and finalizes the award of the preferences tentatively granted, it should require payments for the spectrum so awarded equivalent to those which will be set for nonpreferred licenses through competitive bidding.[1]

I. THE PIONEER PREFERENCE RULES ARE NO LONGER VIABLE.

When the pioneer's preference rules were adopted, the Commission enunciated two rationales: to ensure that entrepreneurs would have access to financial backing for the development of new and innovative services, and to provide additional support for small businesses to participate in wireless services. *NPRM* at paras. 6-7; "Establishment of Procedures to Provide a Preference," *Report and Order*, 6 F.C.C. Rcd. 3488, para. 18 (1991)("*Pioneer's Preference Order*"). Neither of those rationales, however, have survived the passage of the Budget Act.

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[1]SBC does not object to the request by American Personal Communications ("APC") for separate and expedited treatment of the question of whether the tentative pioneer's preferences will be made permanent ("*APC Request*"). Such matters no doubt are important to their planning process. SBC disagrees with APC, however, that APC, Omnipoint and Cox are entitled to a permanent preference simply because they relied on the Commission's admittedly tentative grant. The Commission was quite clear that the preferences were not final until and unless confirmed in the final PCS *Order*, which did not occur. *See, e.g., Tentative Decision and Memorandum Opinion and Order*, released November 6, 1992, GEN Docket No. 90-314, para. 2. It is not uncommon for a regulatory commission to reverse its earlier decision as evidence or circumstances change. The fact that the preferences were tentatively awarded while Congress was considering authorization of spectrum auctioning changes is not really relevant. The FCC was incapable of predicting when or if such authority would be granted by Congress. Indeed, the matter had been debated in Congress for some time.

By subjecting spectrum awarded for commercial uses to auctions, Congress has made it possible for the spectrum to be licensed to the provider which values it most. Such was not necessarily the case when comparative hearings or lotteries were used to award the spectrum. *NPRM* at para. 6. Because access to spectrum is most likely to be granted to the company that values its use the most, the concerns expressed by the Commission that the financial markets will be reluctant to gamble on the vagaries of a lottery now is vitiated. *See, e.g., Pioneer's Preference Order*, paras. 7-12, 18. Indeed, the Commission itself referenced the method of awarding licenses as the chief cause for its concerns and for adopting the preference system. "The present method of assigning licenses ... appears to have dissuaded in the past at least some potential pioneers from seeking the authorization of new communications services." *Id.*, para. 18. The forces of a free market will ensure the proper allocation of spectrum and in so doing encourage financial institutions and backers to advance capital to entrepreneurs whose proposed uses have commercial merit.

Further, the Commission has made significant strides to ensure access to such spectrum licenses by small businesses and targeted groups in its proposed implementation of the Budget Act. The Commission proposes adoption of a number of mechanisms, including an outright set-aside of an entire band of spectrum, to facilitate

access by small businesses, women and minority-owned businesses and rural telephone companies. *Notice of Proposed Rulemaking*, para. 121, PP Docket No. 93-253, released October 12, 1993. These measures obviate the Commission's second stated need for a pioneer's preference, to encourage small business to participate in wireless services.

The Commission notes that the Budget Act expressly reserves to the Commission a decision on whether to retain the pioneer's preference rules. *NPRM* at para. 9. Rather, Congress appears to have left the issue, properly, to the FCC's greater expertise in determining the appropriate administrative process to balance the multiple goals of the Communications Act. The Conference Committee expressly stated, "This (pioneer's preference) policy specifically has never been encouraged, nor discouraged, by an action taken by this Committee.... The provisions of section 309(j) are, again, expressly neutral with respect to these policies." H.R. Rep. No. 103-213, 103rd Cong., 1st Sess. at 485 (1993)("Conference Report").[2]

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[2]APC criticizes the Commission for relying on the Conference Report in construing Section 309(j)(6)(G). APC prefers the Reconciliation Submissions of the Instructed Committees as quoted in the Senate Report. *APC Request* at p. 5, n.7. The plain language of the section, however, does not compel the Commission to retain the rules, but, as noted above, leaves to the Commission's greater expertise the issue of whether such preferences are necessary given the new legislation. Indeed, even the Senate Report supports this view, for it merely states that section 309(j)6(G) is "[c]onsistent with the FCC's statutory obligations and its

Given that the purposes of the pioneer's preference have been vitiated by passage of the Budget Reconciliation Act's authorization to the FCC to award spectrum licenses by auction, the Commission should repeal the pioneer's preference rules.

II. HOLDERS OF PIONEER'S PREFERENCES SHOULD PAY AN AUCTION-EQUIVALENT PRICE FOR THE SPECTRUM LICENSE AWARDED TO THEM.

On October 14, 1993, SBC wrote to the Commissioners in GEN Docket No. 90-314 to support an *ex parte* filing made by Cablevision Systems Corporation on the subject of the size and scope of the personal communications services license which should be granted to winners, if any, of pioneers' preferences. Rather than repeating that discussion here, SBC incorporates by reference that earlier statement (attached hereto as Appendix A). Here, the Company will address the Commission's posing of the question to demonstrate the validity of SBC's position.

In summary, SBC contends that requiring the holder of a pioneer's preference to make some payment, ideally an auction-equivalent price, for the license awarded is both consistent with the goals for awarding preferences and preferable for the development of PCS. The Commission's current pioneer's preference rules do not state that the spectrum awarded is not subject to "mutually exclusive"

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prior efforts in this regard," implying Senate ambivalence toward retention of the policy. *Id.*

applications for spectrum use, the statutory criterion for spectrum auctioning. 47 U.S.C. § 309(j)(1). Nor could they, for as SBC pointed out in its recent *Initial Comments* on the Commission's *Notice of Proposed Rulemaking* in GEN Docket No. 93-253, "mutually exclusive" refers to the use of the spectrum, not to how many applications for use of the spectrum are received by the FCC. The Commission appears to have endorsed this view in that *NPRM* by exempting from auctioning all spectrum which is shared by multiple users. See, *e.g.*, *NPRM* at para. 22, especially n.3. Thus, the fact that a holder of a preference will have some prior right to some portion of the spectrum does not negate the fact that the pioneer should be required to compensate the public for use of the spectrum. The right is assured; the price is in doubt.[3] Of course, if the preference holder is unwilling or unable to pay the price, it will not be awarded the spectrum. This result is fully consistent with the goal of Congress and the Commission to subject spectrum allocation to marketplace forces where that will ensure the most efficient use of the resource.

III. IF PIONEER'S PREFERENCE ARE MAINTAINED, HOLDERS FOR BROADBAND PCS SHOULD BE AWARDED A 10 MHZ LICENSE.

Up to now the Commission has left open the amount

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[3]SBC takes no position on how an auction-equivalent price might be set. Presumably, however, the Commission either could average the prices set by all the auctions for licenses of the same bandwidth and geographic area, or calculate an average price per population point, or some other such formula.

of spectrum and the geographic area to be awarded to holders of a pioneer's preference. If the Commission continues the practice of awarding pioneer's preferences, or if it chooses to make permanent the three preferences tentatively awarded for broadband PCS, SBC urges the Commission to award these companies licenses of 10 MHz in the Basic Trading Areas ("BTA") where they have performed their experiments. The grant of a 30 MHz license is unnecessarily generous and would make economic aggregation of such MTAs much more difficult. Grant of a 20 MHz license would be problematic, since these licenses are set aside for designated entities, and the preference holders may not qualify as such entities. Therefore, if the tentative preference awards are made final, SBC supports the grant of a 10 MHz license. This option gives the pioneer something of real value, which may be combined at auction with other licenses to create a larger or more powerful license if desired. While APC argues that such a grant would be unreasonable because of equipment compatibility problems, it is clear that such problems can be easily rectified as necessary.

IV. CONCLUSION

SBC urges the Commission to eliminate the pioneer's preference rules. If the Commission nonetheless chooses to make the tentative awards for broadband PCS permanent, SBC suggests that the Commission require the holders to pay an auction-equivalent price. Finally, SBC

argues that any preferential license for broadband PCS be limited to a 10 MHz award in a BTA.

Respectfully submitted,

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November 15, 1993

APPENDIX A

Southwestern Bell Corporation

"The One to Call On"

October 14, 1993

BY MESSENGER:

The Hon. James H. Quello, Chairman
The Hon. Ervin S. Duggan, Commissioner
The Hon. Andrew C. Barrett, Commissioner
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20554

Re: Personal Communications Services and Pioneer Preference Issues General Docket No. 90-314

Dear Chairman Quello and Commissioners Barrett and Duggan:

Southwestern Bell Corporation generally concurs with the analysis and conclusions contained in the recent ex parte filing by Cablevision Systems Corporation on the subject of the size and scope of the personal communications services license which should be granted to winners of pioneers' preferences. As Cablevision notes, a 20 MHz basic trading area ("BTA") license in the 1.9 GHz band is a sufficient award because it would satisfy the goal of the preference itself, i.e., that final awardees should be afforded the opportunity to recoup their risky investment in innovative applications without fear that others will harvest their work by contesting their right to commence service. As the Commission remarked in creating the preference mechanism, its purpose is to "permit an otherwise qualified recipient...to apply for a license without facing competing applications. In the Matter of Establishment of Procedures to Provide a Preference to Applicants Proposing an Allocation for New Services. ("Pioneer Preference Docket"), Memorandum Opinion and Order, 6 F.C.C. Rcd. 3488, para. 19 (adopted April 9, 1991; released May 13, 1991). Limiting the preference to the general geographic area in which it is trialed and enough spectrum to provide adequate service certainly satisfies that goal.

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SBC also contends that such a license grant should NOT relieve the pioneer of the obligation to pay some type of fee for the grant. If the FCC ultimately adopts the

spectrum auction rules it announced on September 23, 1993, all other licensees of personal communications services will be required to bid competitively for their license. Allowing the pioneers to be licensed without making a similar investment not only would subvert the intentions of Congress in setting up the auction process, it also would grossly distort the competitive dynamics of the new market the Commission is creating.

The terms of the legislation creating the spectrum auction process nowhere suggests that holders of pioneers' preferences are somehow exempt from the process. On the contrary, Congress dictated that "(i)f mutually exclusive applications are accepted for filing . . ., then the Commission shall have the authority . . . to grant such licents or permit to a qualified applicant through the use of a system of competitive bidding." The only prerequisite to use of the auction process is that mutually exclusive applications for the license are pending.

Some parties suggest that the applications of pioneers for licenses are not "mutually exclusive" because the pioneer's right to a license has already been guaranteed. This interpretation is not supported by the terminology of the statute. The language "mutually exclusive applications" is common parlance in spectrum allocation. A search of LEXIS for use of the term in the FCC decisions turned up more than 1000 documents. Obviously, Congress merely intended the obvious: When only one user may occupy the spectrum for a specified application, the proposals for its use are "mutually exclusive applications." See, e.g., In re Applications of Unified School District, 1993 FCC LEXIS 4904, para. 3 (rel. 9/27/93; adopted 9/15/93). Thus, mutually exclusive applications are distinguished from those applications where multiple users may occupy the spectrum simultaneously, such as the spectrum allocated to garage door openers, cordless telephones and the like. In fact, the Budget Reconciliation Act specifically reserves the right of the FCC to award licenses to pioneers notwithstanding the auction process in Section 6006 (6)(G). If the lawmakers intended to exempt the pioneers from the obligation to pay auction fees, it would have been an easy matter to say so explicitly.

The fact that the spectrum auction process is authorized in the Budget Reconciliation Act should provide some guidance as to the legislative intent of Congress in creating it. Obviously, Congress saw an opportunity to return revenues to the Federal coffers to offset the federal deficit. Excluding some applicants from this

process would run counter to that purpose.

Requiring pioneers to be subject to auction pricing neither disadvantages them as compared to other licensees nor denies them the benefit of their preference. Prior to passage of the Budget Reconciliation Act, all pioneers held the advantage of a guaranteed license. After enactment, nothing changed this real market advantage. As the Commission noted when it created the process, early grant of a preference can enable a pioneer to obtain venture capital because it provides certainty that an opportunity to harvest the market position of the innovation will be available. Pioneer Preference Dockets, para. 5. The mere fact that the pioneer may safely risk his capital some nine to twelve months before the rest of the entrants is itself such a huge advantage that no other need be granted. On the other hand, if a pioneer need not pay for the spectrum license while other entrants risk millions of dollars for the mere privilege of entry, the resulting cost differential between the competing providers may be insuperable. Neither Congress nor the FCC could be thought to intend to grant pioneers an ultimate monopoly that would likely result from this cost advantage. The Commission rejected the proposal of a "headstart" period for pioneers for just this reason. Id., para 33.

Pioneers' preferences and spectrum auctions are two methods by which this Commission truly may join the best of competitive processes and regulation to achieve the ends of the Communications Act, a "nationwide, efficient" telecommunications network of services. If the preferences are elevated to the status of guaranteed markets, however, or the auction process is used to eliminate competition instead of creating it, no public interest will be served. In the view of Southwestern Bell Corporation, the Commission should allocate 20 MHz BTA licenses to the pioneers and require them to pay a price comparable to that yielded by the auction process for similar properties.

Very truly yours,

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cc: (90-314 - Service List)

CERTIFICATE OF SERVICE

I, Paula J Fulks, hereby certify that copies of the foregoing Initial Comments of Southwestern Bell Corporation have been postage prepaid, on the parties listed on the attached.

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